

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TASMIA MOULVI,
et al.,

Plaintiff,

v.

Civil Action No. 3:20-cv-00595-MHL

SAFETY HOLDINGS INC.; *et al.*,

Defendants.

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Tasmia Moulvi (“Plaintiff”) and Safety Holdings, Inc. d/b/a Samba Safety (“Defendant”) stipulate to the dismissal with prejudice of Defendant Safety Holdings, Inc. with each party to pay its own costs and attorney’s fees regarding Plaintiff’s individual and putative class claims against Defendant.

The parties further stipulate to the Court retaining jurisdiction for purpose of enforcement of the settlement agreement pursuant to *Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994).

DATED: March 9, 2023

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